

Robert G. Drummond
Chapter 13 Standing Trustee
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(Trustee)

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MONTANA

In re)	
)	No. 12-60007-13
KIRK KETCHUM and)	
BECKY KETCHUM,)	
)	
Debtors.)	

MOTION OF TRUSTEE TO DISMISS AND NOTICE

Pursuant to Rule 1017 and Mont. LBR 1017-1(b), the undersigned respectfully moves the Court to dismiss the above-entitled case. The grounds for this motion are as follows:

The Debtors are delinquent in their Plan payments. The Debtors' last payment, made on August 5, 2013, went toward the June 2013 payment required by their Plan. The Debtors are in arrears for all Plan payments due subsequent to June 2013. Cause exists for dismissal under 11 U.S.C. § 1307(c)(6) for a material default under the terms of a confirmed Plan.

DATED August 15, 2013.

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P. O. Box 1829
Great Falls, MT 59403-1829

By /s/ Robert G. Drummond
Trustee

**NOTICE OF OPPORTUNITY TO RESPOND
AND REQUEST A HEARING**

If you object to the motion, you must file a written responsive pleading and request a hearing within fourteen (14) days of the date of the motion. The responding party shall schedule the hearing on the motion at least twenty-one (21) days after the date of the response and request for hearing and shall include in the caption of the responsive pleading in bold and conspicuous print the date, time and location of the hearing by inserting in the caption the following:

NOTICE OF HEARING

Date: _____

Time: _____

Location: _____

If no objections are timely filed, the Court may grant the relief requested as a failure to respond by any entity shall be deemed an admission that the relief requested should be granted.

DATED August 15, 2013.

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By /s/ Robert G. Drummond
Trustee

CERTIFICATE OF MAILING

I, the undersigned, do hereby certify under penalty of perjury that a copy of the within and foregoing **MOTION OF TRUSTEE TO DISMISS AND NOTICE** was sent by first class mail postage prepaid on August 15, 2013, at Great Falls, Montana, and directed to the following:

Kirk and Becky Ketchum
1825 Lincoln Street
Helena, MT 59601

/s/ Tiffany Floerchinger
Tiffany Floerchinger